

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: MARK ADAM GRIGGS,	{ CHAPTER 13
	{
	{
DEBTOR	{ CASE NO. R24-40571-PWB
	{
	{ JUDGE BONAPFEL

**OBJECTION TO CONFIRMATION**

COMES NOW K. EDWARD SAFIR, CHAPTER 13 TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor's payments under the proposed plan are not current.

2. The Plan as proposed will extend beyond sixty (60) months, contrary to 11 U.S.C. Section 1322(d). (66 months).

3. The proposed plan fails to provide for the treatment of Republic Finance, Sheffield Financial and Tennessee Valley Federal Credit Union. However, said creditors have filed secured claims.

4. The Chapter 13 Plan fails to provide the purchase date for the claims of Tennessee Valley Federal Credit Union and Sheffield Financial, preventing the Trustee from properly administering this plan.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

\_\_\_\_\_  
/s/  
Deborah A. Reece, Attorney  
for Chapter 13 Trustee  
GA Bar No. 283016

K. Edward Safir, Chapter 13 Trustee  
285 Peachtree Center Ave., NE  
Suite 1600  
Atlanta, GA 30303  
(404) 525-1110  
[deborahr@atlch13tt.com](mailto:deborahr@atlch13tt.com)

R24-40571-PWB

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing pleading using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SAEGER & ASSOCIATES, LLC

I further certify that on this day I caused a copy of this document to be served via first-class United States mail, postage prepaid, on the following parties at the address shown for each:

MARK ADAM GRIGGS  
2408 HOLLY CREEK COOL SPRINGS ROAD  
CHATSWORTH, GA 30705

This 22nd day of May, 2024

Respectfully submitted,

\_\_\_\_\_/s/  
Deborah A. Reece, Attorney  
for Chapter 13 Trustee  
GA Bar No. 283016

K. Edward Safir, Chapter 13 Trustee  
285 Peachtree Center Ave., NE  
Suite 1600  
Atlanta, GA 30303  
(404) 525-1110  
[deborahr@atlch13tt.com](mailto:deborahr@atlch13tt.com)